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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re:	: Chapter 15
LUPATECH S.A., et al.,¹	: Case No. 16-[●] ()
Debtors in a Foreign Proceeding.	: (Joint Administration Pending)
	:

**FOREIGN REPRESENTATIVE'S STATEMENT IN SUPPORT OF CHAPTER 15
PETITIONS FOR RECOGNITION OF A FOREIGN PROCEEDING**

I, Ricardo Doebeli, pursuant to 28 U.S.C. § 1746, hereby declare under penalty of perjury under the laws of the United States of America, as follows:

1. I am the authorized foreign representative (the “**Foreign Representative**”) of the above-captioned debtors (the “**Debtors**”) in a proceeding (the “**Foreign Proceeding**”) commenced in the Federative Republic of Brazil pursuant to Article 61 of Brazilian Law 11.101/2005 of February 9, 2005 (pending before the First Chamber of Bankruptcy, Judicial Recovery and Arbitration Disputes of the Comarca Forum of São Paulo).

2. I respectfully submit this statement, as required under section 1515(c) of title 11 of the United States Code (as amended from time to time, the “**Bankruptcy Code**”), in

¹ The last four digits of the Taxpayer Registration Number or Tax ID, as applicable, of each of the Debtors follow in parentheses: (a) Lupatech S.A. (01-12); (b) Lupatech – Equipamentos e Serviços para Petróleo Ltda. (01-04); (c) Mipel Indústria e Comércio de Válvulas Ltda. (01-00); and (d) Lupatech Finance Limited (none). The Debtors’ collective executive headquarters is located at Rua Alcides Lourenço da Rocha, 167 8o andar, Conjunto 81, São Paulo, Brazil.

support of the Debtors' verified chapter 15 petitions, seeking recognition by the Court of the Foreign Proceeding as a foreign main proceeding.

3. Pursuant to the requirements of section 1515(c) of the Bankruptcy Code, to my knowledge, the Foreign Proceeding is the only insolvency proceeding of any kind pending with respect to the Debtors and, thus, is the only known "foreign proceeding" with respect to any Debtor as that term is defined in section 101(23) of the Bankruptcy Code. The Debtors are the only entities subject to the Foreign Proceeding and the relevant court docket number is 1050924-67.2015.8.26.0100.

4. I declare under penalty of perjury under the laws of the United States of America that, based upon my knowledge, information, and belief as set forth herein, the foregoing is true and correct.

Dated: 04/26, 2016

Respectfully submitted,

By: Ricardo Doebeli,
As: Authorized Foreign Representative of the
Debtors